

IN THE UNITED STATES DISTRICT COURT FILED
FOR THE DISTRICT OF MASSACHUSETTS CLERKS OFFICE

SHELDON G. ADELSON,

Plaintiff,

v.

MOSHE HANANEL,

Defendant.

2004 JUN 14 P 4:49

U.S. DISTRICT COURT
DISTRICT OF MASS.
Civil Action No.

04-cv-10356-RCL

MOTION OF HANANEL TO STAY PROCEEDINGS

Defendant Moshe Hananel ("Hananel") moves for a stay of proceedings in this action pursuant to the federal doctrine of international abstention pending the outcome of substantively identical litigation between the same parties commenced before this action and still pending in Israel. Hananel seeks a stay only as an alternative to dismissal for lack of personal jurisdiction or on forum non conveniens grounds, the subject of separate motions filed simultaneously herewith. As grounds, Hananel relies on the Memorandum In Support and the Affidavit of Moshe Hananel In Support Of Motions filed herewith.

WHEREFORE, as an alternative to dismissal, the subject of separate motions filed simultaneously herewith, the Court should dismiss or stay the action pending the outcome of the Israeli proceedings or until further order of the Court.

I hereby certify that a true copy of the
above document was served upon the
attorney of record for each other party
by mail-hand on 6/14/04
[Signature]

MOSHE HANANEL

By His Attorneys,

[Signature]
James A. G. Hamilton (MA Bar # 218760)

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